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November 6, 2019

**By ECF and Email to [ALCarterNYSDChambers@nysd.uscourts.gov](mailto:ALCarterNYSDChambers@nysd.uscourts.gov)**

Hon. Andrew L. Carter, Jr  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

**Re: *Alexandria Dobbs and Frank Perino v. Metropolitan Transit Authority, New York City Transit Authority, Advanced Transit Co. Inc.;*  
Docket No. 17-CV-8199 (ALC)**

Dear Judge Carter:

This office represents defendants Metropolitan Transit Authority and New York City Transit Authority (collectively, "Transit Defendants") in the above-entitled action. I write to respectfully request that the dates in the briefing schedule for Transit Defendants' anticipated motion to dismiss Plaintiffs' second amended complaint be extended by 18 days. This is Transit Defendants' first request for an extension of this briefing schedule which was set by the Court on November 5, 2019. *See* Order dated November 5, 2019, at Docket Entry No. 83. Plaintiffs consent to the proposed extension. Co-defendant Advanced Transit Co., Inc., consents to the proposed extension on the condition that the briefing schedule is also extended with respect to Advance Transit Co.'s anticipated motion to dismiss.

The reason for this request is that the undersigned counsel will be out of the office on vacation beginning November 7, 2019, and returning December 2, 2019. The majority of that time the undersigned counsel will be out of the country. Transit Defendants, therefore, respectfully request an 18 day extension of the briefing schedule as follows:

Defendants' Motion to Dismiss: December 20, 2019

Plaintiffs' Opposition: January 17, 2020

Defendants' Reply, if any: January 24, 2020

Thank you for your consideration of this request.

Respectfully submitted,

s/Alexis Downs  
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